

Shakoor Brown

No. KB7150

SCI, Camp Hill

2500 Lisburn Road

Camp Hill, Pa. 17001

United States District Court

Middle District of Pennsylvania

February 22, 2022

Shakoor Brown

v.

George Little; William Nicklow;

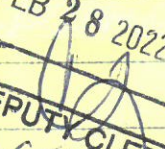
Brad Ritchey; Lieutenant Beaver;

Lieutenant Bartow; Sergeant Johnson.

No.

1822-CV-

Complaint

FILED  
SCRANTON  
FEB 28 2022  
PER   
DEPUTY CLERK  
0293

Plaintiff, Shakoor Brown, brings forth this civil action for actions and omissions that subjected him to inhumane conditions, and that deprived him of basic life necessities. Plaintiff seeks compensatory and punitive damages against Defendants in their personal capacity, and prospective, emergency relief against Defendants in their official capacity.

Parties:

1. Plaintiff, is an adult individual, and currently confined at Camp Hill.

2. George Little, is the Secretary of the Department of Corrections (DOC).

3. William Nicklow, is the Deputy Superintendent of Centralized Services, and Representative of Camp Hill's Program Review Committee (PRC).



4. Brad Ritchey, is the Unit Manager of the Restrictive Housing Unit (RHU) at Camp Hill.
5. Lieutenant's Beaver, and Bartow, are both Lieutenants at Camp Hill.
6. Sergeant Johnson, is a Sergeant at Camp Hill.

Statement of Facts:

7. On or about December 28, 2021, Plaintiff had began a hunger strike, after observing contamination (bodily fluids), inside of his meals.
8. Plaintiff suffers from serious mental health disorders such as anxiety, panic attacks, phobia, and paranoia.
9. Plaintiff is currently on medication for these conditions.
10. During Plaintiff's hunger strike, he was housed inside of a psychiatric observation cell (POC), with video surveillance monitors that record.
11. On February 2, 2022, while Plaintiff was having a mental health crisis, instead of providing him access to proper mental health staff in an attempt to alleviate his emotional disturbance, Defendants Bartow and Johnson had ordered for their subordinate correctional officers to pepper spray Plaintiff, unreasonably and maliciously, in the face, eyes, mouth, and head areas.
12. The pepper spray caused instant blindness, burning, breathing complications, and excruciating pain.
13. However, instead of taking Plaintiff, afterwards, to the medical triage department for decontamination and other medical treatment, Bartow and Johnson had denied him access to medical services, and had



unreasonably and maliciously, taken him back to his cell in pain, visionless, burning, and unable to properly breathe.

14. The Defendants had taken, and kept, all of Plaintiff's property that was in his cell, leaving him with just a suicide blanket and smock, without any legal justification.
15. Defendants Nicklaw and Ritchey had conspired with Bartow and Johnson, on a theory that Plaintiff's behavior was not due to any mental health issue, and thus, forced Plaintiff into a behavior modification program (BMP), rather than a mental health program.
16. This aforesaid BMP program, is governed by the DOC with Little having superior oversight, and Nicklaw, Ritchey, and Defendant Beaver, being the assigned staff to administer the program to Plaintiff.
17. Plaintiff was forced into this program, where his liberty and property is more restricted than any other inmates in the RMU.
18. Plaintiff was never given any opportunity to object to this program, or any process whatsoever.
19. At the onset of the program, an inmate is denied all of his property, including clothes to wear.
20. The alleged objective of the program, is for the inmate to keep good behavior, in order to start receiving his property again, in increments.
21. This program is based on behavior; not mental health.



22. Defendant Little, with final authority over this program, has substantially failed at providing training to his subordinates that administer it, and, consequently, allows for his subordinates to abuse the program in violation of inmates' constitutional rights.

23. Little, has recklessly failed to consider training, in the disparity between inmates that suffer from serious mental illnesses, and those to whom just have behavioral issues.

24. As a result, Plaintiff, an inmate to whom suffers from serious mental illness, and on medication for it, was wrongfully placed in an inappropriate program without due process.

25. Plaintiff began the program on or about February 14th, 2022.

26. Plaintiff is still on hunger strike.

27. By Plaintiff lawfully engaging in a hunger strike, and lawfully refusing medical assessments, Defendants Nicklow, Ritchey, and Beaver, has used his rights against him, in order to extend the confiscation of his property and clothes, in an arbitrary and capricious manner.

28. It is apparent that Defendants are abusing their assigned roles in the Plaintiff's program, with no real intention on ever giving him back his belongings.

29. The housing cells, where Plaintiff is at in the RMU, is extremely cold, to which, he has no ability



to keep warm.

30. Plaintiff is unable to read, write, or otherwise communicate with family, or submit grievances to Administration.

31. Without having access to a pen, grievance form, or writing paper, Plaintiff is unable to exhaust his Administrative remedies.

32. By reason of the aforesaid acts and omissions, caused by Defendants, Plaintiff has, and continues to suffer and be subject to:

A. physical and psychological torture.

B. Aggravation to preexisting mental illnesses.

C. vision and breathing impairments.

D. discomfort from cold temperatures.

E. denial of freedom of speech.

33. By reason of the aforesaid, Defendants knowingly, willingly, and intentionally, without care of Plaintiff's liberty interest to humane conditions, violated his:

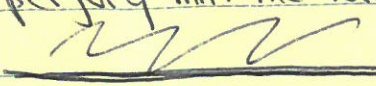
A. First Amendment right to freedom of speech.

B. Supervisory liability.

C. Eighth Amendment right to be free from excessive use of force and deliberate indifference to his medical and mental health conditions.

D. Fourteenth Amendment right to due process.

34. Plaintiff seeks damages in an amount in excess of \$ 50,000.00, costs, fees, and injunctive relief.

I verify under penalty of perjury that the foregoing is true and correct. Shaquon Brown  Feb. 22, 2022



United States District Court  
Middle District of Pennsylvania

February 22, 2022

Shahour Brown

v.

No. 1:22-CV-0293

George Little; William Nicklow;  
Brad Ritchey; Lieutenant Beaver;  
Lieutenant Bartow; Sergeant Johnson.

Summons

To Defendants:

You have been sued in Court. You have 30 days, after service of summons on you, to serve on the Plaintiff an answer to the attached complaint. The answer must also be served upon this Court. If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint.

1. George Little, 1920 Technology Pkwy, Mechanicsburg, PA 17050
2. Remaining Defendants, 2500 Lisburn Rd, Camp Hill, PA 17001
3. Plaintiff, 2500 Lisburn Rd, Camp Hill, PA 17001

Clerk of Court

Shakoor Brown

No. KB7150

SCI. CAMP Hill

2500 Lisbon Rd.

Camp Hill, PA 17001

1-22-CV-0293

February 22, 2022

Peter J. Welsh, Clerk

U.S. Courthouse, Middle

235 N. Washington Ave.

Scranton, PA 18501

Re: Civil Filing / IFP


Dear Mr. Welsh:

Enclosed herein, please find the following:

1. Summons
2. Complaint
3. Application to Process In Forma Pauperis
4. Motion to Appoint Counsel
5. Motion For Preliminary Injunction
6. Brief

Thank You!

Yours Truly,

  
Shakoor Brown



Charles Talbert  
No. Q44727

Sci. Camp Hill  
2500 Lisbon Road  
Camp Hill, PA 17001

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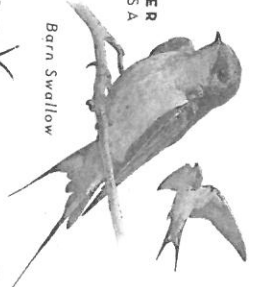
FEB 28 2022

PER

DEPUTY CLERK

Mr. Peter J. Welsh, Clerk  
J.S. Coothouse, Middle  
235 N. Washington Ave.  
Scranton, PA 18501

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